

New Hampshire Special Education Program Approval Report

SAU 61

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**Visit Conducted on:
November 18 and 19, 1998**

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(Commendations, Citations, and Suggestions for each school)

Note: *It should be noted that suggestions are not considered corrective actions and therefore are given as technical assistance. The district is not mandated to implement them.*

New Hampshire Special Education Program Approval Report

SAU 61

I. INTRODUCTION:

A New Hampshire Department of Education Special Education Program Approval visit was conducted at SAU 61 comprised of the following schools: Memorial Drive School, Henry Wilson Memorial School and Farmington High School. The visiting team met on November 18 and 19, 1998 in order to review the status of special education services being provided to eligible students.

Activities related to this evaluation included the close review of all the teaching certifications of special education staff, analysis of SPEDIS data and random inspection of student records. Interviews were held with the special education director, building principals, regular and special education teachers, related service personnel and administrators as time and availability permitted. In addition, the team conducted parent interviews via telephone. Throughout the visit, the team had full cooperation from the school personnel and this helpfulness was greatly appreciated.

The report that you are about to read represents the consensus of all the members of the visiting team. Please keep in mind that this is a "report for exception", meaning that only exceptions to the N.H. State Standards have been addressed. If a component is not mentioned, that does not mean that the team did not review it; it just means that there were no citations of noncompliance to the Standards found in that particular area.

II. STATUS OF PREVIOUS ON-SITE: *Conducted on November 9 and 10, 1993*

Based on a review of the previous program approval report, as well as the application materials submitted for the 1998 program approval and visits to all SAU 61 schools, the visiting team determined that SAU 61 staff have made efforts to show improvement and to address the citations listed in the 1993 report. However, it was the consensus of the external team members that there continues to be a significant pattern of non-compliance in many of the same procedural and programming areas.

The issues of non-compliance identified through the previous visit include several basic themes. At that time there were numerous citations in procedural areas and a suggestion was made to revise special education forms, provide training and identify building level roles to determine who was responsible for the implementation of special education procedures. It was noted that, while there was no Special Education Director for the SAU, the Superintendent was able to manage the overall special education process for the district. The visiting team also determined through a review of the SPEDIS information that student placement and discharge was not fully up to date. There was no Special Education curriculum for self-contained programs. The Pre-School program did not include any special education certified staff.

This visiting team found that, while forms have been revised during the past five years, they have not been updated to keep current with the changing state and federal laws. In addition, staff have not had the ongoing inservice training necessary for the understanding and implementation of special education procedures. The long

term combined effects of limited resources along with the lack of a special education administrator, has had a serious impact in the area of special education for this SAU.

The following report will further reflect that in the past five years there has been a general lack of progress seen in staffing patterns, procedural accuracy, qualitative programming, curriculum development, recruiting and maintaining appropriately certified special education staff and a general depth of understanding of educational best practices that should be evident in each public school system.

III. ISSUES OF SIGNIFICANCE:

While it was clear to the visiting team that the staff of SAU 61 are hard working professionals who have made efforts to correct the previous areas of noncompliance, it is also evident that there continues to be significant patterns of noncompliance related to the delivery of special education services that must be addressed. Most notable is the fact that a number of the same themes and areas in need of attention that were present five years ago during the previous program approval visit still exist today.

The SAU continues to experience a high rate of staff turnover. The general difficulty this district has in attracting and keeping professional staff who are presently certified in the areas of disabilities of students served, has a significant impact on the both the quality and consistency of programming offered. There are a number of staff presently seeking certifications through alternative methods, however, this process implies that a level of ongoing support and supervision is available to these individuals. Such continuous efforts further take away from the time certified staff are able to provide to student programming. In at least one case, the professional responsible for special education programming holds an unrelated certification in science and had not yet begun an alternative program to seek special education certification.

While a revision of the forms used to carry out special education procedures has taken place since the last program approval visit, such a process requires ongoing review as State and Federal guidelines are continuously clarified and revised. The absence of a district-wide special education administrator has resulted in a serious lack of attention to the specific policies and procedures required of all public school systems. The visiting team makes the same observation regarding a need for updated district-wide procedures and ongoing training and communication to all staff regarding the implementation of all standards.

There continues to be no special education curriculum for students in programs where the modification of regular curricula would be inadequate to meet their educational needs.

The preschool program continues to offer special education programming without a certified special educator on staff or in direct, regular consultation. Furthermore, the program is self-contained with students having very limited inclusionary experiences with non-disabled peers.

The previous report contains a suggestion that additional clerical assistance be provided in each building to help special education professional staff so that less of their time is spent on clerical tasks, and more time is available for the important student programming. There has been no additional clerical staff assigned to assist the special education department as of this time. The district is again encouraged to consider the best use of professional staff and review the possibility of adding clerical support.

The district is commended for their recent inservice training sessions related to IEP development and implementation. The district indicates that training for all staff is a priority and will continue to address a variety of educational issues. They are commended for this initiative and encouraged to include all professional and paraprofessional staff in training opportunities.

The staffing patterns at the High School level continues to require adjustment. One special educator there continues to carry a caseload of over 40 students, the same number as five years ago. The district may wish to review all staffing patterns in the district to assure that caseloads are reasonable for staff to carry out the programming required.

The SAU has very successfully completed construction of a new high school facility since the previous visit. This building offers excellent physical space and learning environment for the high school students. However, the need for improved physical facilities continues to exist for the elementary and middle school students. The main building and annex used for grades preschool through eight appears to be overcrowded, poorly maintained and poorly ventilated. The SAU is encouraged to continue to explore building improvement options so that safe, appropriate learning space is available for all of the district's students.

The SAU has also recently approved the hiring of a consultant on a part time basis, to oversee the administration of the special education programs. The importance of a district-wide administrator cannot be overstated at this time. The suggestion is strongly made that a full time permanent position be created in an effort to bring the district into full compliance and to work toward developing a long-range district-wide plan for future programming and philosophy.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS: SAU-WIDE

Name of Program(s) Visited: All

COMMENDATIONS:

- The district is commended for the recent inservice training offered to staff on special education issues such as IEP development and the Reauthorization of IDEA 1997 and training in issues related to Section 504.
- The building level staff are professional and hard working and are commended for their efforts.
- The superintendent is commended for his vision and for his interest in working with the education staff to set new goals and work together toward school improvements.
- The community is commended for their support of the construction of the new high school facility.

CITATIONS: (in numerical order)

<u>Ed#1119.07 (a)</u>	Not all teachers hold New Hampshire certification appropriate for the educational disabilities of the students they serve.
<u>Ed# 1119.07 (b)</u>	Paraprofessional personnel do not always work under the supervision of an appropriately certified professional.
<u>Ed# 1107</u>	SAU 61 is without written procedures for numerous aspects of the special education evaluation procedure.
<u>Ed# 1119.03 (c)</u>	The SAU does not currently provide a special education curricula to students with educational needs greater than the regular school curricula can provide.
<u>Ed# 1109</u>	SAU 61 is without written procedures for the comprehensive aspects of the development of and Individual Education Program.
<u>Ed# 1111</u>	SAU 61 is without written procedure for Extended Year Programming.
<u>Ed# 1113</u>	SAU 61 is without written policy for the Vocational Education for students with disabilities.
<u>Ed# 1115.05</u>	SAU 61 is without written procedure for providing Home-Based Programming.
<u>Ed# 1130.04</u>	SAU 61 has no written procedure for Emergency Placement for children with educational disabilities.
<u>Ed#1130.07</u>	SAU 61 has no written procedures for the Determination of Liable School District.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS: SAU-WIDE Cont'd.

SUGGESTIONS:

- The SAU should continue to offer in-service staff development training to all staff, including paraprofessionals, on issues of significance. The areas to be considered include, but are not limited to: inclusionary practices, collaborative instruction, the pre-referral and referral processes, IEP development, 504 Plans and their place in the continuum of services offered to all students, paraprofessional training and supervision, communication systems between general and special education staff members, etc.
- The SAU should continue to examine the high rate of staff turnover and seek solutions to maintaining a more consistent faculty. The frequent staff turnover results in a general lack of common goals and philosophy as well as in the need to constantly train new and inexperienced staff, among other issues.
- The district is encouraged to continue seeking space solutions for all students at the Elementary and Middle Schools. The space available for programming is significantly limited and, in some areas, poorly ventilated.
- The SAU should review the full continuum of special education and general education services presently available in the SAU to determine if these offerings represent the programming necessary to meet the full range of all educational needs. Consideration should be given to the development of programming for the developmentally disabled and emotionally disabled populations.
- The SAU should create a position of district-wide Director of Special Education to insure the development and implementation of all necessary State and Federal procedures. The addition of this position should also provide all district staff and parents with leadership toward the development of appropriate special education programming for all identified students.
- The district should review the SAU-wide reading program and determine if the addition of a Reading Specialist is necessary to coordinate the district-wide reading programs. There is presently no Reading Program offered for students with reading difficulties at the high school level.
- The SAU should create the special education curriculum necessary to offer to those students whose educational needs cannot be met through the modification of the regular school curriculum.
- The SAU should review the staffing patterns that presently exist within the special education department to determine if the addition of more special education certified staff is necessary to provide the services determined by the students' Individual Education Program plans. This is particularly a concern at the High School where the caseload of one special educator is significantly high.
- The SAU should consider the addition of clerical staff to assist with the special education paperwork that is required by State and Federal procedures. The special education staff is currently spending a disproportionate amount of their professional time attending to clerical tasks.

MEMORIAL DRIVE ELEMNTARY SCHOOL

PROGRAM(S) VISITED: Resource Room Program, Inclusionary Program

COMMENDATIONS:

- The staff are enthusiastic, friendly and are clearly caring and committed to the students.
- There are good support services available to students in the classroom.
- The office personnel were helpful to the visiting team.
- There is a good staff to student ratio available in the resource room.
- The building principal is interested in working toward program improvements and maximizing available resources.
- The parent contacted indicated significant support for the program.
- The office staff were friendly and helpful.
- Students are successfully included in the general education settings.
- The staff are commended for the recent addition of the Pre-referral Teacher Assistance Team that should increase communication and programming decisions regarding student academic needs prior to a special education referral.

CITATIONS:

Ed# 1107.02 (b)(d) 1 file: No evidence of written notice provided to parents following a referral.

Ed# 1107.05 (k) 1 file: Evaluation is not completed within 45 days.

Ed# 1107.07 (c) 2 files: There was no LEA Representative present at meeting.

Ed# 1109.03 (a-d) 1 file: IEP development team is not complete.

Ed# 1125.03 (2) 1 file: No evidence of description of evaluations upon which the decision was made.

Ed# 1125.04 (a)3-4 1 file: No evidence of written consent for placement.

SUGGESTIONS:

- Provide ongoing staff development to address all areas of non-compliance.
- Review and revise the special education referral process and assure that all staff fully understand the process.
- Determine if there is some clerical assistance available to support the special education staff.
- Improve the communication system among staff so that there are times available to meet and plan for curriculum, consultation and student programming.

MEMORIAL DRIVE SCHOOL, Cont'd.

SUGGESTIONS, Cont'd.:

- Consider the need for a more fully developed continuum of services (i.e. developmentally disabled, emotionally disabled students).
- Provide consultation time for paraprofessional staff to meet with professional staff to communicate and plan for student programming.
- Provide inservice training for paraprofessional staff.
- Consider the need for more appropriate physical space for programming within the elementary school.
- Review the inclusionary options for the self-contained pre-school program to determine if more integration is available for the pre-school special education students.

MEMORIAL DRIVE ELEMENTARY SCHOOL

PROGRAM(S) VISITED: Pre-School Program (Self-Contained)

COMMENDATIONS:

- The SAU is commended for the established contracted services through Strafford Learning Center to provide a comprehensive Child Find process that identifies students prior to placement in pre-school programming at the Memorial Drive Elementary School.
- The pre-school staff are commended for their enthusiasm and efforts in developing the program this year.
- The elementary special education staff are commended for their support of the pre-school program.

CITATIONS:

Ed#1107.02 (b)(d) 1 file. There is no evidence that written notice was given to parents following a referral or the written notice of disposition was offered within 15 days of the referral.

Ed#1107.07©3 1 file. No LEA representative identified at SEE/PT meetings.

Ed#1111.01 1 file. There is no evidence that Extended School Year was considered.

Ed#1119.07 The Pre-School teacher does not currently hold a certification appropriate for the educational disabilities of the students served.

SUGGESTIONS:

- The Pre-School teacher should be supervised in a consistent manner by an appropriately certified staff member, while she is seeking an alternative special education certification.
- The Pre-School students should be offered opportunities for increased participation with non-disabled peers. The self-contained program presently does not include any typical students. Students do have an opportunity to interact during a recess period but it is recommended that the district seek further programming integration with non-disabled peers.
- The transition from the early intervention program to the district based Pre-School program should be more clearly defined, in an effort to improve the transition process.
- Pre-school staff should be included in any training sessions addressing special education procedures, curriculum designs, and any other relevant topics as determined by the district staff.

HENRY WILSON MEMORIAL SCHOOL

PROGRAM(S) VISITED: Modified Regular Program, Resource Room Program

COMMENDATIONS:

- There is a dedicated and enthusiastic staff at the Middle School.
- The inclusion model appears to work well for some students.
- All school activities are available to all students.
- The IEPs are developed with long range plans that translate nicely into transition plans and can aid in planning the move from middle to high school.
- The parent contacted indicated satisfaction with child's program.

CITATIONS:

<u>Ed# 1107.03 (a)</u>	2 files: Evaluation team does not meet multidisciplinary criteria.
<u>Ed# 1107.03 (i)</u>	1 file: evaluation is not current.
<u>Ed# 1107.07(c)(1,3)</u>	4 files: SEE/PT determining disability is not complete. LEA representative is not identified.
<u>Ed#1107.08 (c)</u>	1 file: No observation is found in record.
<u>Ed# 1125.03</u>	3 files: Evidence of Written Prior Notice is either incomplete or missing.
<u>Ed# 1115.03</u>	3 files: Team membership is not complete.
<u>Ed# 1109.01(i)</u>	1 file: Evaluation criteria not complete.
<u>Ed# 1109.01(b)</u>	1 file: Annual goals not complete.
<u>Ed# 1109.03</u>	3 files: IEP development team not appropriate.
<u>Ed# 1111.01</u>	3 files. No evidence that Extended School Year was considered.

SUGGESTIONS:

- Training for all staff is strongly suggested to provide information regarding the procedural requirements related to State and Federal Special Education Standards. Other topics could include collaborative instruction, inclusionary models at the middle school level, behavioral programs and continuum of services, among other topics.

HENRY WILSON MEMORIAL SCHOOL, Cont'd.

SUGGESTIONS, Cont'd.:

- A review of the present continuum of services is necessary at the Middle School. There is presently no program designed to address the needs of the emotionally disabled student. Further, the self-contained program is functioning without an assigned program number from the Department of Education. It is not clear what the entrance criteria is for this program and the students placed there now represent a wide range of disabilities. This program also does not have a curriculum designed to meet the significant needs of the students presently assigned there. Further, the space presently utilized for this self-contained program is unacceptable in numerous ways (poorly ventilated, lack of small group instructional space, unsafe area that includes power tools easily accessible by students and could cause harm, etc.).
- Staff certification is a significant concern at the Middle School. The special education staff there do not presently hold certifications in the areas of suspected disabilities, although they are either participating in or planning to participate in, alternative certification programs. The district is urged to review the need to seek fully certified staff as well as to provide immediate support and supervision to the present staff members so that student educational needs may be appropriately met.
- The Middle School presently has one counselor. It seems apparent that the range of student needs cannot be met with one counselor and the district is encouraged to consider the addition of a second counselor, particularly to assist in the work necessary to meet the emotional needs of the disabled population.
- The team model in place at the Middle School does not appear to lend itself fully to regularly scheduled planning times for general education and special education staff to meet. The communication necessary to provide well developed inclusionary instruction relies on consistent communication models. The staff are strongly encouraged to review the present schedule and seek opportunities of ongoing communication.
- Paraprofessionals should be included in communication systems in order to fully understand the educational needs and plans for the students they are assigned to.

FARMINGTON HIGH SCHOOL

PROGRAM(S) VISITED: Support Center, Developmental Disability Program

COMMENDATIONS:

- The High School staff are dedicated, enthusiastic and committed to educating all students.. Staff interviewed indicated positive attitudes toward the special education programs.
- The staff is commended for the weekly communication meetings.
- Students appear to be successful in academic areas.
- There is an extensive and successful effort to find vocational programs for students.
- The new physical facility is impressive, offering appropriate learning spaces. The building and grounds are well maintained.
- Students are well integrated, having access to a wide variety of courses and activities.
- The building administration have a positive impact on the atmosphere and program development at the High School.

CITATIONS:

Ed# 1109.01(a) 1 file: The IEP does not include present levels of performance.

Ed# 1109.01(l) 1 file: Transition component is incomplete.

Ed# 1102.35(n) 1 file: Transition component is incomplete.

Ed# 1109.03 1 file: IEP development team did not include an LEA representative.

Ed# 1111.01 3 files: No evidence that Extended School Year was considered.

Ed# 1107.07(c)1,3 2 files: SEE/PT determining disability does not consist of teacher certified in the area of suspected disability. LEA representative is not indicated as present.

SUGGESTIONS:

- There is a significant concern regarding the special education staffing patterns at the High School. The SAU is strongly encouraged to review the present caseloads and determine if an additional special educator is warranted to deliver special education services to the students.
- The lack of any Reading Program at the High School level should be addressed. One parent interviewed indicated significant concern that her sophomore son is presently reading at a second grade level and does not receive any reading remediation.

FARMINGTON HIGH SCHOOL, Cont'd.
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SUGGESTIONS, Cont'd.:

- Staff should be offered training sessions to review all special education procedures regarding State and Federal Standards so that areas of noncompliance are addressed as soon as possible.
- Staff request ongoing inservice opportunities to maintain current information on best practices. Training should include paraprofessional staff, as well.
- The visiting team recommends that progress be noted on IEP forms in the space provided. The narrative progress reports reviewed by the team were not always specific to the IEP goals.

ADDENDUM

JAMES O. MONITORING PROGRAM

SAU 61

Student File Review

Case Study Document

Reimbursement Claim Form

Case Study Addendum Form

<p style="text-align: center;">ADDENDUM JAMES O. MONITORING PROGRAM</p>

SAU 61

NUMBER OF FILES REVIEWED: 3 FILES

CITATIONS:

<u>Ed# 1107.02 (d)</u>	1 file: One record does not include a written consent of parent to evaluate.
<u>Ed# 1107.03 (I)</u>	2 files: In one record evaluation is not complete therefore not current. In one record evaluation is missing.
<u>Ed# 1107.07(c)</u>	1 file: Record is unclear that certified teacher in area of each suspected disability was present at evaluation meeting.
<u>Ed#1107.08 (d)</u>	1 file: There is no written report signed by team members.
<u>Ed# 1123.04 (a,10)</u> <u>Ed# 1123.14</u>	3 files: No record of disclosure to receiving schools.
<u>Ed# 1123.05</u>	1 file: No evidence of annual notification of rights, etc.
<u>Ed# 1109.11</u>	2 files: No evidence of regular and systematic monitoring of IEP.
<u>Ed# 1109.01</u> <u>Ed# 1102.35</u>	1 file: Not statement regarding unneeded transition services.
<u>Ed# 1111.01</u>	2 files: There is no evidence that ESY was considered.
<u>Ed# 1130.03(d)(1-5)</u> <u>Ed# 1130.03(e)(g)(3)</u>	1 file: No record that LEA convened team to consider all aspects of IEP, Placement and WPN documenting teams decisions and work.

SUGGESTIONS:

- There are significant procedural gaps in the James O. records reviewed in SAU 61. The absence of correct policies, procedures and corresponding documentation is most likely a result of the lack of an SAU administrator who would oversee the special needs of students' with court ordered placements. Consequently, the SAU currently has numerous procedural violations. The SAU is strongly encouraged to seek a full time special education administrator for the purpose of correcting present areas of noncompliance and creating a system that would ensure the all special education procedures are correctly administered.